

1 HONORABLE RICHARD A. JONES
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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10 ORGANO GOLD INT'L, INC., a Washington
corporation,

11 Plaintiff,

12 v.

13 LUIS VENTURA, an individual, LUZ
14 ANGELA VENTURA, an individual; and
L&A VENTURA MANAGEMENT, INC., a
Texas corporation,

15 Defendants.

16 NO. 2:16-CV-00487-RAJ

17 DECLARATION OF GIANSALVO
18 LICARI IN OPPOSITION TO MOTION
19 FOR TEMPORARY RESTRAINING
20 ORDER AND PRELIMINARY
21 INJUNCTION

I, Giansalvo (“John”) Licari, do say and declare:

1. I am the chief operating officer (“COO”) of Total Life Changes, LLC (“TLC”).

As such, I oversee all of TLC’s daily operations and report directly to the chief executive officer, Jack Fallon. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.

2. TLC is a nutritional supplement company which uses the marketing (multi-level) network distribution channel to sell a wide range of consumer products. TLC’s range of products includes teas, oils, shapewear garments, skin care lotions, cleansing products, make-up products, weight loss products, and nutritional supplementation products. In total, TLC has a total of

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DECLARATION OF GIANSALVO LICARI IN OPPOSITION TO
MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION - 1
(CASE NO. NO. 2:16-CV-00487-RAJ)

GARVEY SCHUBERT BARER
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS
eighth floor
1191 second avenue
seattle, washington 98101-2939
206 464 3939

1 forty-eight (48) different products that are available for sale. Of these forty-eight (48) products,
2 only five are ganoderma-infused coffee. In 2015, TLC's sales of ganoderma-infused coffee
3 represented only 5.7% of total sales, and more than ninety percent (90%) of TLC's product sales
4 were of products having nothing to do with ganoderma.

5 I declare under penalty of perjury under laws of the United States that the foregoing is true
6 and correct.

7 Executed this 13th day of April, 2016 at Fair Haven, Michigan.



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9 Giansalvo Licari
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DECLARATION OF GANSALVO LICARI IN OPPOSITION TO
MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION - 2
(CASE NO. NO. 2:16-CV-00487-RAJ)

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206 464 3939

1 **CERTIFICATE OF SERVICE**

2 I, Greta Nelson, certify under penalty of perjury of the laws of the State of Washington
3 that on April 14, 2016, I electronically filed the foregoing document with the Clerk of the Court
4 using the CM/ECF system which will send notification of such filing to all associated counsel
5 of record.

6 Kevin A. Bay

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11 SIGNED this 14th day of April, 2016 at Seattle, Washington.

12 *s/ Greta Nelson*

13 Greta Nelson, Legal Assistant
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15 1191 Second Avenue, 18th Floor
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20 DECLARATION OF GIAN SALVO LICARI IN OPPOSITION TO
21 MOTION FOR TEMPORARY RESTRAINING ORDER AND
22 PRELIMINARY INJUNCTION - 3
23 (CASE NO. NO. 2:16-CV-00487-RAJ)

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